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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mitchell Lazarus

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April 7, 1995

William F. Caton, Acting Secretary
Federal Communications Commission
Room 222 -- Mail Stop 1170
1919 M Street N.W.
Washington DC 20554

**Re: RM-8608, Amendment of Section 15.247(a)(1)(ii) of the
Commission's Rules on Spread Spectrum Operation**

Dear Mr. Caton:

On behalf of Symbol Technologies, Inc., I enclose an original and four copies of the "Clarification of Symbol Technologies, Inc." for filing with the Commission in the above-captioned proceeding.

Kindly date-stamp and return the extra copy of this cover letter.

If there are any questions about this filing, please call me at the number above.

Respectfully submitted,

Mitchell Lazarus

Enclosures

cc (w/encl): Dr. Frederic P. Heiman
Raymond A. Martino
Leonard H. Goldner, Esq.
Symbol Technologies, Inc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

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APR - 7 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Amendment of Section 15.247(a)(1)(ii))
of the Commission's Rules on Spread)
Spectrum Operation)

RM-8608

TO: The Acting Secretary

CLARIFICATION OF SYMBOL TECHNOLOGIES, INC.

1. Symbol Technologies, Inc. ("Symbol") hereby submits this Clarification of Symbol's Petition for Rule Making ("Petition") in the above-captioned proceeding.^{1/}

2. On December 6, 1994, Symbol filed a Petition in this proceeding which asked the Commission to amend Section 15.247(a)(1)(ii), on frequency-hopping spread spectrum systems operating at 2400-2483.5 and 5725-5850 MHz, to reduce the minimum number of hopping frequencies from 75 to 15 and to increase the maximum permissible bandwidth.^{2/} The Petition explained that this change will align U.S. standards more closely with European standards and hence reduce the cost of U.S. exports to Europe, and will help to satisfy customer demand for high speed and low cost in the emerging market for wireless computer networks, but will not significantly increase the threat of interference to other users of the band.

^{1/} Symbol's Petition appeared on public notice on February 28, 1995.

^{2/} Symbol's proposed rule text is reprinted below.

3. It has come to Symbol's attention that the last sentence of its proposed paragraph (B) could be read to permit dwell times on a single frequency of up to 2 seconds (30 seconds/15 hops). It was not Symbol's intention to increase the dwell time beyond the present maximum of 0.4 seconds. To make this clear, Symbol now suggests changing the figure "30 seconds" in the last sentence of proposed paragraph (B) to "6 seconds."^{3/}

4. With that adjustment, Symbol's proposed amendment to Section 15.247(a)(1)(ii) reads as follows. Material proposed to be added to the current rule appears in bold type. The additional change suggested by this Clarification is indicated by strike-out and double underline.

(ii) **(A)** Frequency hopping systems operating in the 2400-2483.5 MHz and 5725-5850 MHz bands shall use at least 75 hopping frequencies. The maximum 20 dB bandwidth of the hopping channel is 1 MHz. The average time of occupancy on any frequency shall not be greater than 0.4 seconds within a 30 second period.

(B) As an alternative to paragraph (A), frequency hopping systems operating in the 2400-2483.5 MHz and 5725-5850 MHz bands may use at least 15 hopping frequencies whose 20 dB bandwidths do not overlap. The average time of occupancy on any frequency shall not be greater than 0.4 seconds within a ~~30~~ 6 second period.^{4/}

^{3/} 6 seconds/15 hops = 0.4 seconds.

^{4/} Symbol noted in its Petition that paragraph (A) is no longer strictly necessary, because equipment operating under paragraph (B) will also comply with paragraph (A). Symbol nonetheless urges the Commission to leave paragraph (A) intact to reassure readers who lack technical training that products

(continued...)

CONCLUSION

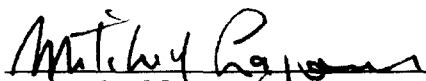
5. As explained above, Symbol clarifies its Petition for Rule Making to ensure that the maximum dwell time on any one frequency remains unchanged from the present 0.4 seconds.

Respectfully submitted,

Symbol Technologies, Inc.
2145 Hamilton Avenue
San Jose, CA 95125-5905
(408) 369-2646



Gerald P. McCartin



Mitchell Lazarus

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April 7, 1995

Counsel for
Symbol Technologies, Inc.

^{4/} (...continued)
manufactured in accordance with the present rule will satisfy the proposed rule as well.

CERTIFICATE OF SERVICE

I, Mitchell Lazarus, do hereby certify that on this 7th day of April, 1995, I have caused copies of the foregoing "Clarification of Symbol Technologies, Inc." to be served upon the following by hand:

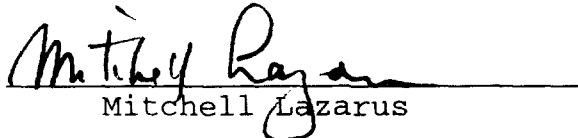
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